

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America

v.

Terrell Hicks

Case No.

Case: 2:21-mj-30537

Judge: Unassigned,

Filed: 11-10-2021 At 05:27 PM

USA v. TERRELL HICKS (CMP)
(MLW)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of November 9, 2021 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

*Code Section**Offense Description*

18 U.S.C. § 922(g)(1)

Felon in possession of a firearm having traveled in interstate and/or foreign
commerce

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: November 10, 2021City and state: Detroit, Michigan*Complainant's signature*Task Force Officer Jaclyn Kocis-Maniaci, A.T.F.*Printed name and title**Judge's signature*Hon. Antony P. Patti, U.S. Magistrate Judge*Printed name and title*

**AFFIDAVIT IN SUPPORT OF
CRIMINAL COMPLAINT**

I, Task Force Officer Jaclyn Kocis-Maniaci, being first duly sworn, hereby depose and state as follows:

I. INTRODUCTION AND AGENT BACKGROUND

1. I am a police officer with the City of Detroit. I have been with the Detroit Police Department since 2003. I became a Task Force Officer with the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) in January of 2017. During my career, I have been involved in numerous investigations involving firearms and narcotics laws resulting in successful federal and state prosecutions.

2. I make this affidavit from personal knowledge based on my participation in this investigation. The information comes from witnesses interviewed by law enforcement, communications with others who have personal knowledge of the events and circumstances described herein, and information gained through my training and experience.

3. This affidavit is for the limited purpose of establishing probable cause that Terrill HICKS has violated Title 18, United States Code, Section 922(g)(1), Felon in Possession of a Firearm, and does not

contain all details or facts known to law enforcement related to this investigation.

II. PROBABLE CAUSE

4. On November 9, 2021, Detroit Police Department (DPD) officers were on patrol in the area of Freud and Kitchener, in the city of Detroit. Officers observed a black Chrysler 300 with illegal window tint. Officers executed a U-turn in their vehicle and saw the Chrysler 300 make a right turn without signaling. Officers attempted to initiate a traffic stop. While behind the Chrysler 300, officers observed the driver, later identified as Terrill HICKS, throw a large black object out of the window and heard a loud noise as if a metal object hit the pavement.

5. The Chrysler 300 pulled over and the officers approached the vehicle. Officers observed live rounds belonging to an assault rifle on the front passenger side floorboard. HICKS was given verbal commands to exit the vehicle and he complied. HICKS was detained.

6. DPD Officers canvassed the area where they had observed HICKS's throwing motion. Officers recovered a black DPMS Panther Arms AR-15 rifle, with four rounds of .223 ammunition in the magazine and one in the chamber, from the easement area next to the driveway.

Additionally, approximately ten live rounds of .223 ammunition were recovered from the vehicle.

7. On November 09, 2021, a computerized criminal history check showed that has the following felony convictions:

- a. 2015- distribution of a controlled substance (cocaine base), Eastern District of Michigan
- b. 2018- complicity to forgery, Ohio.

8. On November 10, 2021, Special Agent Jimmie Pharr advised Affiant, based upon the verbal descriptions provided, without physically examining the firearm, that the referenced firearm is a firearm as defined under 18 U.S.C. § 921, and was manufactured outside of the state of Michigan after 1989, and therefore had traveled in and affected interstate commerce.

III. CONCLUSION

9. Probable cause exists that Terrill HICKS, a convicted felon, did knowingly possess a firearm and ammunition, that had previously traveled in interstate and/or foreign commerce, in violation of 18 U.S.C. § 922(g)(1).



Jaclyn Kocis-Maniaci, Task Force Officer
Bureau of Alcohol, Tobacco, Firearms
and Explosives

Sworn to before me and signed in my
presence and/or by electronic means



HON. ANTHONY P. PATTI November 10, 2021
United States Magistrate Judge